

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MAR - 9 2022
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

CORNELIUS M. GREEN and
PHILLIP J. CUTLER,

Defendants.

4:22CR136 RLW/SPM

INDICTMENT

The Grand Jury charges that:

At all times relevant to this indictment:

Jocelyn Peters was a resident of St. Louis City, Missouri and worked as a schoolteacher in the St. Louis City Public Schools.

CORNELIUS M. GREEN was a resident of St. Louis City, Missouri and worked as a school principal in the St. Louis City Public Schools.

PHILLIP J. CUTLER was a resident of Oklahoma.

CORNELIUS M. GREEN and PHILLIP J. CUTLER had a longstanding and close friendship.

CORNELIUS M. GREEN was legally married to Steffanie Green and was involved in multiple romantic relationships with other women.

Jocelyn Peters and CORNELIUS M. GREEN were engaged in an ongoing personal and romantic relationship.

In 2015, Jocelyn Peters became pregnant. CORNELIUS M. GREEN was the father of Peters' unborn child.

COUNT I
MURDER FOR HIRE CONSPIRACY: 18 U.S.C. § 1958

Beginning at an exact time unknown to the Grand Jury, but including February 29, 2016 through October 11, 2016, within the Eastern District of Missouri and elsewhere,

**CORNELIUS M. GREEN and
PHILLIP J. CUTLER,**

together with each other, did knowingly and intentionally combine, conspire, and agree to commit an offense against the United States of America, to wit, murder for hire in violation of Title 18, United States Code, Section 1958, by traveling in and causing others to travel in interstate commerce, and by using and causing others to use the United States mails and other facilities of interstate commerce, including but not limited to United Parcel Services, credit cards and cellular telephones, with the intent that the murder of Jocelyn Peters and her unborn child, be committed in violation of the laws of the State of Missouri, as consideration for the receipt of, and as consideration for a promise and agreement to pay things of pecuniary value, namely money, along with other benefits.

Said conspiracy offense resulted in the death of Jocelyn Peters and her unborn child on or about March 24, 2016.

OBJECT AND PURPOSE

The objects and purposes of the conspiracy were the murder of Jocelyn Peters and her unborn child, and the obtaining of money and other benefits and the avoidance of financial obligations and liabilities as a result of and in exchange for the commission of Jocelyn Peters' and the unborn child's murder.

MEANS AND METHODS

The means and methods by which the conspiracy was sought to be accomplished included, among other things, the following:

(1) It was part of the conspiracy that GREEN devised a plan to murder Peters and her unborn child.

(2) It was further part of the conspiracy that GREEN stole, misappropriated and obtained by fraud cash from Carr Lane Middle School.

(3) It was further part of the conspiracy that GREEN offered and CUTLER accepted something of pecuniary value (namely cash), to murder Jocelyn Peters and her unborn child.

(4) It was further part of the conspiracy that on or about February 29, 2016, GREEN, using a cell phone in St. Louis, Missouri, sent a text message to CUTLER's cell phone in Oklahoma asking CUTLER to come to St. Louis the week of March 20, 2016. CUTLER responded, "Ok, that will work, u gonna b sending the pacge?"

(5) It was further part of the conspiracy that on or about March 7, 2016, GREEN sent a United Parcel Service package containing \$2,500 in U.S. Currency to CUTLER. GREEN used an address of 1004 N. Jefferson Ave. (Carr Lane Middle School) when sending the package.

(6) It was further part of the conspiracy that on or about March 8, 2016, in Oklahoma, CUTLER received the package sent by GREEN, accepting the cash in exchange for his planned killing of Peters and her unborn child.

(7) It was further part of the conspiracy that on or about March 21, 2016, CUTLER traveled from Oklahoma to St. Louis and stayed at a residence occupied by GREEN and his sister.

(8) It was further part of the conspiracy that on or about March 22, 2016, GREEN and CUTLER, traveling in GREEN's 2013 white Kia Optima sedan, went to the Amtrak train station

and GREEN took an Amtrak train to Chicago, Illinois, leaving CUTLER with the Kia and a ring of keys containing the key to the Kia as well as keys necessary to access Jocelyn Peters' apartment.

(9) It was further part of the conspiracy that GREEN traveled to the Chicago, Illinois area to establish an alibi for the murder of Jocelyn Peters and her unborn child, which he and CUTLER had planned CUTLER to commit while GREEN was out of town.

(10) It was further part of the conspiracy that on or about March 24, 2016, CUTLER traveled to the area of 4236 W. Pine in the City of St. Louis in GREEN's 2013 Kia Optima, unlawfully entered Jocelyn Peters' apartment, Unit #201, found Peters in her bed, shot her with a .380 caliber firearm in her head, using a potato as a silencer to muffle the sound of the shot.

(11) It was further part of the conspiracy that Jocelyn Peters and her unborn child were killed as a result of CUTLER shooting Peters in the head.

(12) It was further part of the conspiracy that on March 24, 2016, at approximately 6:40 a.m., GREEN used a cell phone and a Visa credit card to purchase a return Amtrak train ticket from Chicago's Union Station to St. Louis so there would be verification that he was in Chicago at the time of the murder.

In violation of Title 18, United States Code, Section 1958.

COUNT TWO
MURDER FOR HIRE: 18 U.S.C. §§ 1958 & 2

The Grand Jury further charges that:

Beginning at an exact time unknown to the Grand Jury, but including February 29, 2016 through March 24, 2016, within the Eastern District of Missouri and elsewhere,

**CORNELIUS M. GREEN and
PHILLIP J. CUTLER,**

aiding and abetting one another, traveled and caused others to travel in interstate commerce and

used and caused others to use the United States mail and facilities of interstate commerce, including cellular telephones, with the intent that the murders of Jocelyn Peters and her unborn child, be committed in violation of the laws of the State of Missouri, as consideration for the receipt of, and as consideration for a promise and agreement to pay things of pecuniary value, namely money, and other items of pecuniary value.

Said offense resulted in the death of Jocelyn Peters and her unborn child on or about March 24, 2016.

In violation of Title 18, United States Code, Sections 1958 and 2.

A TRUE BILL.

FOREPERSON

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